

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:18CR0876 JAR
)	
ASHU JOSHI,)	
)	
Defendant.)	

GOVERNMENT'S NOTICE OF INTENT
TO USE CERTIFIED COPY OF BUSINESS RECORDS

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Colleen Lang, Assistant United States Attorneys for said District, and files its Notice of Intent to Use Custodian of Records Affidavit pursuant to Rules 803(6) and 902(11) of the Federal Rules of Evidence. In support thereof, the Government asserts:

1. Defendant is charged with Production of Child Pornography, Interstate Transportation of a Minor, and Distribution of Child Pornography.
2. The Government notified defense counsel that Government was in possession of Facebook Records that were provided to the Government after a search warrant was executed upon Facebook for the defendant's Facebook account. The defendant has had access to these records in full at the Government's office since January 3, 2019. The defendant has had possession of a copy of these records without the photographs attached to them since early November 2019. The Government cannot turn over the records in full to the defendant since

photographs depicting child pornography are attached to the records. They are still available for review at undersigned's office.

3. The Government intends to offer at a pre-trial hearing and at trial, pursuant to Rules 803(6) and 902(11) of the Federal Rules of Evidence, the certified business records of Facebook.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/ Colleen C. Lang
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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Dan Juengel

s/ Colleen C. Lang
COLLEEN C. LANG, #56872MO
Assistant United States Attorney